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Race to the Top District Competition: The Data Quality Campaign's Comments on ED's Proposed Criteria

The Data Quality Campaign (DQC) submits these comments in response to the US Department of Education's (ED) draft requirements, priorities, selection criteria, and definitions for the Race to the Top District (RTT-D) competition.

DQC applauds ED for including the following components of the proposal:

- Data is acknowledged throughout the proposal as a critical tool for students, parents, and educators to use to inform student-centric teaching and learning.
- Data is a means to an end, and too often federal policies ignore the data implications or demands of specific strategies. The proposed criteria appear to acknowledge the data implications of its requirements by requiring districts to put in place certain data systems capacities. [Our concerns about the specific approaches to the data requirements are discussed below.]
- Data cannot be leveraged to inform decisionmaking if stakeholders lack access to timely, actionable information and the training to use it effectively. The proposed language calls for providing leadership teams, educator teams, parents, and students with data, acknowledging that all of these stakeholders need training and support to ensure they have the data literacy skills to understand and use available tools and resources.
- Local education agencies (LEAs) and schools need support implementing best practices to comply with federal and state privacy and security policies and protect student information. The RTT-D language acknowledges that critical need by requiring applicants to work with ED to put in place deliberate implementation plans that address those issues.
- Culture change is the most difficult part of any continuous improvement process. The RTT-D language acknowledges that putting in place tools is not the same thing as creating a culture that embraces the effective and appropriate use of data to inform decisionmaking. As such, it asks applicants to indicate how the implementation plan will translate into meaningful reform and support districtwide change. It will be difficult for grantees to demonstrate and the federal government to monitor these kinds of outcomes.

Specific comments and recommendations to strengthen the proposed language:

Federal policy should seek to make education policies more coherent and streamlined, reinforce state and district alignment, and reduce burden where possible. Throughout the application, the RTT-D language can be strengthened to ensure LEAs are aligning with and leveraging state efforts where possible.

1. Aligning with and leveraging existing state policies and efforts.

Federal policymakers, through legislation and administrative action, have already embraced a theory of action (through the America COMPETES Act, the American Recovery and Reinvestment Act, and the Statewide Longitudinal Data Systems Grant Program) supporting state education agencies (SEAs) to build specific data capacity and advance statewide data practices to ensure consistency, quality, and efficiency. While the RTT-D language pays significant attention to the data capacity needed to implement some of its requirements, the language also may unnecessarily require or encourage LEAs to re-create data capacity that is already in place at the state level or that LEAs, particularly smaller and rural LEAs, may not be well positioned to create. This could unintentionally encourage districts to replicate or circumvent current state efforts, create unnecessary burden, or unnecessarily take LEAs out of the running for the program.

ED's Proposed Language	DQC Observation or Recommendation
As a part of selection Criteria, (B) District Capacity and Success Factors, applicants must describe the state context in which the applicants will be lawfully implementing the proposal.	Given the extent of the data implications, ED should include in this section a requirement that applicants describe how they are leveraging existing state data systems and tools to support implementation of their plans, if applicable.

2. Educator evaluation systems and related data capacity.

DQC does not take a position regarding the implementation of teacher and principal evaluation systems, the consequences for individual educators as a result of those policies, or the federal role in leveraging them. However, DQC does encourage policymakers and education leaders at all levels to ensure that when such evaluation systems include student performance data as a factor, steps are taken to ensure that indicators used are comparable across systems and that the data and the teacher-student data link are accepted as high quality, reliable, and fair by critical stakeholders—particularly teachers.

ED's Proposed Language	DQC Observation or Recommendation
<p>ED's proposal includes among the eligibility requirements that the LEA has designed and committed to implement no later than the 2014-15 school year:</p> <ul style="list-style-type: none"> • Teacher and principal evaluation systems that use student growth as a significant factor • A robust data system that has an individual teacher identifier with a teacher-student match 	<p>ED has already embraced a theory of action through the America COMPETES Act, the American Recovery and Reinvestment Act, and the Statewide Longitudinal Data Systems Grant Program that state education agencies should implement statewide practices for a unique educator ID and a robust teacher-student data link (TSDL). As states have worked to implement a robust TSDL, a set of promising practices¹ have emerged to develop a statewide teacher of record definition, ensure the ability to link multiple teachers to students per course, and ensure accurate and up-to-date data through a roster verification process and multiple data collection periods.</p> <p>LEA applicants should be required to align with existing statewide practices where they exist. For example, all states have implemented a unique educator ID, and 25 states have implemented a statewide teacher of record definition. If their state does not already have in place a teacher evaluation system or statewide TSDL practices, LEA applicants should be encouraged to address similar emerging practices and to engage stakeholders in the process of developing the data policies and practices related to these evaluation systems to ensure quality and buy-in.</p> <p>The desire for implementation of principal evaluations based on student performance data is an emerging area; applicants should keep in mind the sequencing of the availability of student data from state assessments and personnel decisions.</p> <p><i>Recommendations:</i></p> <p>The RTT-D language should ensure that applicants, where possible, align with and leverage work already happening at the state level:</p> <ul style="list-style-type: none"> • Require LEA applicants to use statewide unique educator ID (if available). • If the state has provided statewide parameters around TSDL practices, require LEA applicants to demonstrate they are complying with those practices. • If the state has not implemented statewide parameters around TSDL promising practices, require LEA applicants to address those practices as part of their plans.

¹ [Using Data to Improve Teacher Effectiveness: A Primer for State Policymakers](#)

3. Matching K–12 and postsecondary data and performance metrics.

DQC does not take a position regarding which performance metrics or performance targets should be required as part of a given program. However, DQC believes public transparency around performance metrics is an important component of any policy effort. Moreover, performance metrics should be carefully selected and designed to measure the intended outcomes of the effort, and they should be comparable across systems. Federal and state policymakers should take steps to ensure critical performance metrics are commonly defined, made transparent and accessible to the public, and designed and collected in a manner that limits collection and reporting burden.

Matching K–12 and Postsecondary Data

ED's Proposed Language	DQC Observation or Recommendation
<p><i>Eligibility requirements:</i></p> <p>That the LEA has designed and committed to implement no later than the 2014–15 school year, robust data systems with the ability to match student level P–12 and higher education data.</p>	<p>We assume that the proposed RTT-D eligibility requirement related to P–12 data linkages is included for the sole reason of ensuring that that LEAs have the data capacity to produce college enrollment rates for demonstrating progress toward the ambitious and achievable annual goals.</p> <p>ED has already embraced a theory of action through the America COMPETES Act, the American Recovery and Reinvestment Act, and the Statewide Longitudinal Data Systems Grant Program that state education agencies should link P–12 and higher education data. In fact, states are already required to report college enrollment rates by high school and LEA under the State Fiscal Stabilization Fund program (this applies to all 50 states and DC) and the 2012 ESEA flexibility for those states that have received them.</p>
<p><i>Selection criteria, vision:</i></p> <p>The extent to which the applicant's vision will translate into increased improved student performance and equity as demonstrated by ambitious yet achievable annual goals on specific indicators, including college enrollment rates.</p>	<p>It is inefficient and duplicative to require districts to develop independent data systems' capacity to collect, match, analyze, and report this data. While some large urban school districts have worked with local college systems to develop data sharing agreements, most LEAs have limited capacity to address the political, legal, and technical barriers to securing higher education data themselves, particularly for long-distance, out-of-state, and private institutions that their graduates may enroll in. Even if LEAs work with a third-party vendor (such as the National Student Clearinghouse) to secure this data, it is a different strategy than the proposed language's mandate to implement an LEA data system with the ability to match student-level P–12 and higher education data itself.</p> <p><i>Recommendations:</i></p> <p>The RTT-D language should ensure that applicants, where possible, align with and leverage existing state-level efforts:</p> <ul style="list-style-type: none"> • Eliminate the eligibility requirement for LEAs to implement a data system with the ability to match student-level P–12 and higher education data. • ED should clarify how it can make use of existing state reporting requirements and federal collections to support efficient production of college enrollment rates. • If the requirement for LEAs to report this information themselves is maintained, require LEAs to indicate if they are not currently receiving this data from the state, and if so, describe their alternative method to secure the data.

Performance Metrics

ED's Proposed Language	DQC Observation or Recommendation
<p>Under <i>Selection Criteria, Vision (A)</i>, paragraph (2), the proposal indicates the applicants vision must demonstrate how it will translate into progress towards annual goals for improving performance on summative assessments, decreasing student achievement gaps, graduation rates, college enrollment rates, student attendance, and teacher attendance.</p> <p>Under <i>Selection Criteria, Preparing Students for College and Careers (C)</i>, <i>Performance Metrics (4)</i>, the proposal lists a different set of indicators for which the applicant is to establish annual goals including rates of access to highly effective educators; on-track to college- and career-readiness rates; rates of accessing personalized learning plans; graduation rates; teacher survey completion rates; and students survey completion rates.</p>	<p>ED should:</p> <ul style="list-style-type: none"> Clarify the relationship between the indicators listed in the Vision section and those in the Performance Metrics section. Clarify if and how grantees will be required to report—to ED and to the public—the final performance metric. Describe how it will reduce reporting burden by utilizing existing state reporting requirements and federal data collections to streamline the collection and reporting of the final performance metrics. Consider if grantees can receive relief from any existing data collections as a benefit to participating in this program.

Any questions related to these comments should be directed to
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